

UNITED STATES OF AMERICA, )  
 )  
 )  
 v. ) Criminal No. 14-cr-40028-TSH  
 )  
 JAMES MERRILL, )  
 Defendant )

Now comes the defendant James Merrill, by and through undersigned counsel, and hereby moves the Court for an order modifying Mr. Merrill's conditions of release as follows: (1) permitting Mr. Merrill's son, Curran (21 years of age), to temporarily serve as the third-party custodian in this case so that Mr. Merrill's wife can travel (a) to Wisconsin from June 23 to July 3 to assist her parents move into an Assisted Living home and (b) to Mississippi from July 20 to July 25 on a mission trip with her church, and (2) permitting Mr. Merrill to travel with his wife to a wedding in Maine, leaving home on July 18 and returning home on July 20, 2015.

Pretrial Services does not assent to Mr. Merrill's travel to Maine for the wedding.

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Respectfully submitted,  
JAMES MERRILL,  
By his Attorney,

**/s/ Robert M. Goldstein**  
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Dated: June 17, 2015

**Certificate of Service**

I, Robert M. Goldstein, hereby certify that on this date, June 17, 2015, a copy of the foregoing document has been served via the Electronic Court Filing system on all registered participants, including Assistant U.S. Attorneys Andrew Lelling and Cory Flashner.

**/s/ Robert M. Goldstein**  
Robert M. Goldstein